

TIMOTHY J. LEPORE (SBN 13908)
ROPERS, MAJESKI, KOHN & BENTLEY
3753 Howard Hughes Parkway, Suite 200
Las Vegas, NV 89169
Telephone: (702) 954-8300
Facsimile: (213) 312-2001
Email: timothy.lepore@rmkb.com

Attorneys for Defendant
PARAMOUNT EQUITY MORTGAGE, LLC
dba LOANPAL

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DONALD SULLIVAN,

Plaintiff,

v.

PARAMOUNT EQUITY MORTGAGE, LLC
dba LOANPAL,

Defendant.

Case No. 2:19-cv-00567-APG-BNW

**STIPULATION FOR EXTENSION OF
TIME TO RESPOND TO PLAINTIFF'S
COMPLAINT**

(SECOND REQUEST)

Defendant Paramount Equity Mortgage, LLC dba Loanpal (hereinafter "Loanpal"), by and through its counsel, Timothy J. Lepore of Ropers Majeski Kohn & Bentley, and Plaintiff Donald Sullivan ("Plaintiff"), by and through his counsel, Michael Kind of Kazerouni Law Group, APC, hereby stipulate and agree as follows:

1. On April 4, 2019, Plaintiff filed his Complaint in the United District Court, Central District of Nevada, naming Loanpal as a defendant.

2. On April 5, 2019, this Court issued Summons for Loanpal, directing Loanpal to respond to the Complaint within 21 days after service of the Complaint and Summons.

3. On April 17, 2019, Plaintiff caused for a process server to serve the Complaint and Summons on Loanpal's registered agent. As a result, according to Rule 12 of the Federal Rules of Civil Procedure, Loanpal's last day to respond to Plaintiff's Complaint was May 8, 2019.

4. The parties subsequently entered into settlement negotiations in an attempt to bring

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1 this matter to resolution before engaging in protracted litigation.

2 5. On or about May 21, 2019, the parties filed a Stipulation for Extension of Time to
3 Respond to Plaintiff's Complaint (First Request) (ECF No. 8), which the Court subsequently
4 granted (ECF No. 9), making Loanpal's last day to file a responsive pleading or motion to
5 Plaintiff's Complaint June 19, 2019.

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6. The parties continue to negotiate a settlement to this matter, but do not expect to come to an agreement by June 19, 2019. Accordingly, Plaintiff and Loanpal have stipulated that Loanpal's last day to file a responsive pleading or motion to Plaintiff's Complaint is July 19, 2019.

IT IS SO STIPULATED.

Dated: June 17, 2019

ROPERS, MAJESKI, KOHN & BENTLEY

By: /s/ Timothy J. Lepore

TIMOTHY J. LEPORE
Attorneys for Defendant
PARAMOUNT EQUITY MORTGAGE,
LLC
dba LOANPAL

Dated: June 17, 2019

KAZEROUNI LAW GROUP, APC

By: /s/ Michael Kind

MICHAEL KIND
Attorneys for Plaintiff
DONALD SULLIVAN

IT IS SO ORDERED: Defendant Loanpal's last day to file a responsive pleading or motion to Plaintiff's Complaint or Notice of Settlement is July 19, 2019.


UNITED STATES MAGISTRATE JUDGE

Dated: June 20, 2019

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of June, 2019, I served a true and correct copy of the foregoing **STIPULATION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT (SECOND REQUEST)** via the Court's CM/ECF electronic filing and service system to all parties on the current service list.

/s/ Peggy Kurilla

Peggy Kurilla, an employee of
ROPERS, MAJESKI, KOHN & BENTLEY

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